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Rachel Perillo

June 17, 2020

**By ECF**

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Mustapha Raji  
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. This letter is jointly submitted with the government in response to the Court's Order dated June 15, 2020 regarding whether the June 29, 2020 status conference should proceed as scheduled. After conferring with the government, it has been determined that due to the ongoing COVID-19 pandemic, the June 29, 2020 status conference should be adjourned to the week of October 26, 2020 at a date and time that is convenient for the Court. The defendant consents to the exclusion of time under the Speedy Trial Act.

At the currently-scheduled June 29, 2020 status conference, the parties would have discussed defense motions and the scheduling of a trial date. The Court's current motion schedule is as follows: Defense Motions due on June 26, 2020; Oppositions due on July 10, 2020; and Replies due on July 17, 2020. Because counsel is still in the process of reviewing discovery and has not yet had an opportunity to meet with Mr. Raji due to the circumstances of the pandemic, it is respectfully requested that the current motion schedule be modified as follows: **Motions Due:** October 23, 2020; **Oppositions Due:** November 6, 2020; **Replies Due:** November 13, 2020.

Finally, because it is currently uncertain when in person court proceedings will resume, we do not believe it is necessary to schedule a trial date at this time.

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If the Court has any questions regarding this matter, please contact my office.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Eun Young Choi (by ECF)  
AUSA Dina McCleod (by ECF)